

1 McGREGOR W. SCOTT
United States Attorney
2 ANGELA L. SCOTT
Assistant United States Attorneys
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5

6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 5:20-MJ-00041-JLT

11 Plaintiff,

[PROPOSED] ORDER REGARDING
GOVERNMENT'S DISCLOSURE OF SENSITIVE
MATERIALS

12 v.

13 MIGUEL ZUNIGA ARTEAGA,
ARMANDO MARTINEZ,
JOSE EDEN LANDEROS,
RENE ZEPEDA FELIX,
ISRAEL MUNGUA-MUNOZ,
TERRY WHITED,
MIGUEL ANGEL SANCHEZ-MEZA
17 JUAN VIZUETT-RESENDIZ, and
VINCENTE SALVADOR ARENAS-GARCIA,
18

Defendants.

20 The Court has received and considered the government's Ex Parte Application Regarding
21 Disclosure of Sensitive Materials. The Court has also received a REDACTED AFFIDAVIT and an
22 UNREDACTED AFFIDAVIT in support of a complaint and search warrants regarding the above-
23 captioned matter. The government has represented that, upon the defendants' arrest, it will move to
24 unseal the REDACTED AFFIDAVIT, but seeks an order authorizing production of the sealed
25 UNREDACTED AFFIDAVIT to defense counsel pursuant to a protective order to comply with its
26 discovery obligations.

27 Good cause showing, IT IS HEREBY ORDERED THAT:
28

1 Defense counsel shall not distribute the UNREDACTED AFFIDAVIT to anyone other than
2 his/her own legal staff (including paralegal assistants, legal secretaries, defense investigators, and
3 lawyer-associates);

4 Defense counsel shall not allow anyone other than himself/herself and his/her legal staff to
5 possess, or maintain possession of, the UNREDACTED AFFIDAVIT;

6 Defense counsel may permit defendant to review the UNREDACTED AFFIDAVIT, but only in
7 his/her presence or in the presence of his/her own legal staff;

8 Defense counsel may not disclose publicly the contents of the portion of the UNREDACTED
9 AFFIDAVIT that was previously redacted in the REDACTED AFFIDAVIT, including in any court
10 filing, without first conferring with government counsel and, in any event, shall file any previously
11 redacted part of the UNREDACTED AFFIDAVIT under seal.

12 At the conclusion of this matter, defense counsel will collect and destroy any and all copies of
13 the UNREDACTED AFFIDAVIT that defense counsel possesses and/or has made and distributed to
14 his/her agents, except a copy set as necessary to maintain in defense counsel's case file.

15 The government's Ex Parte Application Regarding Disclosure of Sensitive Materials is
16 SEALED. This Protective Order shall not be sealed.

18 IT IS SO ORDERED.

20 Dated: November 3, 2020


THE HONORABLE JENNIFER L. THURSTON
UNITED STATES DISTRICT COURT JUDGE